



Re: Chuit regulations package -

William Beckwith to: Carl D Reese,
(DEC) 02/15/2013 06:00 PM
Cc: "Tabor, Brock N (DEC)",
"Sonafrank, Nancy B (DEC)",
Angela Chung

Carl - As noted yesterday, this represents a rather cursory review. My main thought is that the analyses and documentation supporting the draft conclusions/proposed WQS revisions are incomplete.

- EPA has commented that a modifying factor of 3 should be used when assessing exposure to manganese from drinking water. As I look at the issue again, it seems there might be confusion as to how that factor is to be applied. I am seeking clarification of the appropriate approach. Nevertheless, applying the modifying factor of 3 as described in EPA's 2004 Drinking Water Health Advisory for Manganese and EPA's comments on the Chuitna work will yield lower criteria concentrations than ADEC has calculated, when other variables are held constant.

- Further data and discussion should be presented to justify that WER testing with samples collected at only one location is representative of the entire site to which the proposed site-specific criteria would be applied. There are also other instances where few data and little discussion are provided in support of the conclusions. To the extent that ADEC is relying on information provided by PacRim/Tetra Tech, it might still be useful to present key data in the text of your document.

- The results of the metals mixture test needs further consideration. Even if we resolve the details, the bigger picture is that dissolved metals criteria are being proposed at higher dissolved metals concentrations than were measured in the test solution. This issue still needs to be resolved.

- I do not recall ever seeing water chemistry data for the site water sample used in the metals mixture text. My apology if I am mistaken. Such data are useful in documenting that a representative sample was used.

- I understand that ADEC had not intended to adopt a site-specific acute criterion for aluminum, but is it ADEC's intent to delete its current acute criterion for aluminum? Clarification please, maybe I am confused by the "NA" for acute aluminum in Table 5 and the absence of any acute criterion for aluminum in Table 8.

- Since the WER and metals mixture testing had included lead, I was surprised that ADEC was not proposing site-specific criteria for lead. Clarification please.

- EPA guidance does not "require" a geometric mean of the individual WERs.

- A zinc chronic criterion should not be proposed at a value that is greater than the acute criterion.

- The form of metal for each proposed site-specific criterion should be clear. This is not specified in Table 5, for example (but now I see it is specified in Table 8.)

Hopefully these comments are useful. I expect we will be discussing them, so I can fill in some of the missing detail then. Please note that EPA is changing email systems this weekend, so things might be a little disrupted the beginning of next week. Please call me as needed.

Thanks.

- Bill
206-553-2495

"Reese, Carl D (DEC)"

01/11/2013 05:43:34 PM

From: "Reese, Carl D (DEC)" <carl.reese@alaska.gov>
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Bill. Attached are the deliberative drafts for the proposed changes to regulations on tributaries of the Chuit River. We are hoping to have comments from EPA by the end of January. Please contact me if you have questions about any of this. Thanks in advance.

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[attachment "Chuitna Seasonal Agricultural Use Decision Proposed 1-11-13 ns.docx" deleted by William Beckwith/R10/USEPA/US]
[attachment "Chuitna SSC DecisionProposed draft 1-11-13 ns.docx" deleted by William Beckwith/R10/USEPA/US]